

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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IN RE MOTION FOR CIVIL CONTEMPT BY JOHN :  
DOE :

Case No. 12 mc 557 (BMC)

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FILED UNDER SEAL  
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X  
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**SIMON MILLER**, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury, as follows:

1. I am a Partner at Blank Rome, LLP, attorneys for non-party Frederick Oberlander (“Oberlander”) in connection to the above captioned matter. I respectfully submit this declaration in opposition to the motion of John Doe (n/k/a Felix Sater)(“Movant”) to hold Oberlander in civil contempt pursuant to 18 U.S.C. § 401, to impose sanctions against Oberlander pursuant to Fed. R. Civ. Pro. 11, and requesting certain other relief.

2. Attached hereto as Exhibit A is a copy of the May 29, 2014 Order of the Honorable Magistrate Judge Frank Maas.


3. Attached hereto as Exhibit B is a copy of the August 11, 2011 letter from Nader Mobargha to the Honorable District Court Judge Naomi R. Buchwald.

4. Attached hereto as Exhibit C is a copy of the December 17, 2007 New York Times article entitled “Real Estate Executive With Hand in Trump Projects Rose From Tangled Past.”

5. Attached hereto as Exhibit D is a copy of the publicly available docket for Richard Roe, et al. v. United States, et al., No. 12-112

6. Attached hereto as Exhibit E is a copy of Richard Roe's motion to file a petition with the United States Supreme Court under seal and a redacted petition on the Court's public docket.

Dated: New York, New York  
June 23, 2015



**SIMON MILLER**